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Attorneys for Plaintiff and Counterdefendant
Technology Licensing Corporation

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

TECHNOLOGY LICENSING
CORPORATION,

Plaintiff,

v.

THOMSON, INC.,

Defendant.

Case No. CIV S-03-1329 WBS PAN

**STIPULATED REQUEST AND
[PROPOSED] ORDER PERMITTING
TECHNOLOGY LICENSING
CORPORATION TO FILE ITS
SECOND AMENDED COMPLAINT**

The parties hereto, through their respective counsel of record, hereby submit this stipulated request that TLC be permitted to file its Second Amended Complaint. As TLC explained in the Parties Joint Status Report (Dkt. No. 226 at p. 2), the originally asserted patents in this litigation, U.S. Patent Nos. 5,754,250 and 5,486,869, and were reissued by the United States Patent and Trademark Office as United States Patent Nos. RE 40,411 and RE 40,412,

1 respectively. TLC thereby seeks to file its Second Amended Complaint in order to substitute the
2 reissue patents for the originally asserted patents, to remove AV Technologies as a party, and to
3 assert infringement by Thomson of one or more of the additional claims from each of the '411
4 and '412 reissue patents.

5 Good cause exists for TLC to file its Second Amended Complaint, as Thomson has
6 consented (without waiving any objections or defenses) to TLC's filing its Second Amended
7 Complaint pursuant to Fed.R.Civ.Proc. 15(a)(2). This filing will not impact any deadlines in the
8 scheduling order (Dkt. No. 229). Pursuant to L.R. 5-137(c), TLC's Second Amended
9 Complaint is attached as Exhibit 1.

10 Dated: January 15, 2010

NIRO SCAVONE HALLER & NIRO

11 By: /S/ Kara L. Szpondowski
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17 **CORPORATION**
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18 Attorneys for Plaintiffs

19 Dated: January 15, 2010

DUANE MORRIS LLP

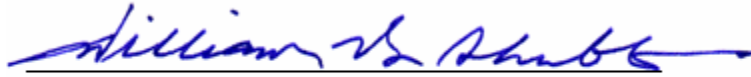
20 By: /S/
21 Richard T. Redano
22 Gary R. Maze
Christina C. Marshall

23 Attorneys for Defendant

ORDER

IT IS HEREBY ordered that Technology Licensing Corporation may file its Second Amended Complaint.

Dated: January 19, 2010



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE